

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
Baltimore Division

IN RE:	:	
MICHAEL ALLAN MCNEIL	:	Case No. 12-18903
Debtor	:	Chapter 13 – Judge Rice
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MICHAEL ALLAN MCNEIL	:	
Plaintiff	:	
v.	:	Adv. No. 12-00829
V. PETER MARKUSKI, JR.	:	
Defendant	:	

MOTION TO DISMISS PLAINTIFF’S COMPLAINT

Defendant, V. Peter Markuski, Jr., by and through his attorneys, Jeffrey W. Bernstein, Esquire, and Goozman, Bernstein & Markuski, pursuant to Rule 7012(b) of the Federal Rules of Bankruptcy Procedure, for the reasons stated in the Memorandum of Points and Authorities which accompanies this Motion, moves this Court to Dismiss the Complaint filed herein by the Debtor, Michael Allan McNeil (the “Debtor” or “McNeil”) as to all counts of the Complaint.

WHEREFORE, V. Peter Markuski, Jr. respectfully requests that this Court grant its Motion to Dismiss the Complaint with prejudice and without leave to amend, and grant V. Peter Markuski his costs expended in this action and any further relief the Court deems just and proper.

GOOZMAN, BERNSTEIN & MARKUSKI

BY: /s/ Jeffrey W. Bernstein
Jeffrey W. Bernstein
Attorneys For Plaintiff
9101 Cherry Lane, Suite 207
Laurel, Maryland 20708
(301) 953-7480
Federal Bar No. 08458

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the forgoing Motion to Dismiss Plaintiff's Complaint was mailed first class, postage prepaid or by ECF this **4th day of January, 2013**, to the following:

Michael A. McNeil
7014 Gentle Shade Road
Apartment 402
Columbia, MD 21046

Nancy Spencer Grigsby, Trustee
4201 Mitchellville Road, Suite 401
Bowie, MD 20716

/s/ Jeffrey W. Bernstein
Jeffrey W. Bernstein